UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF RHODE ISLAND

LORI ZARLENGABLAQUIERE
Plaintiff

C.A. No. 06-534 ML

V.

EDWARD A. CHARBONEA, individually
and in his capacity as Chief of Police
of the North Kingstown Police Department,
ROBERT D. DESJARLAIS, individually
and in his capacity as Detective Lieutenant
of the North Kingstown Police Department,et al.,
GREGORY JOHNSON, individually and in his
capacity as Captain of the West Warwick Police Department,
PATRICK KELLEY individually and in his capacity as
Patrol Officer of the West Warwick Police Department, et al.,
Defendants

PLAINTIFFS OBJECTION AND MOTION FOR RECONSIDERATION OF THIS COURTS ORDER ENTERED ON MARCH 16, 2007 REGARDING (DOCKET # 28), JUDGE MARY LISI DENYING PLAINTIFF'S MOTION FOR A 90 DAY EXTENTSION OF TIME

COMES NOW , Lori Zarlenga Blaquiere (Plaintiff) and hereby object to this Court's Order entered on March 16, 2007 regarding (Docket #28), **Judge Mary Lisi** denying Plaintiff's 90 day Motion for an Extension of Time. Plaintiffs hereby moves this Court, to grant Plaintiffs Objection and Motion for Reconsideration of this Courts Order entered on March 16, 2007 denying Plaintiff's 90 day Motion for an Extension of Time or in the alternative the Plaintiff requests that this Court grant Plaintiff a 60 day extension of time, **(See attached Order entered in this Court on March 16TH 2007 regarding (Docket # 28), Judge Mary Lisi denying Plaintiff's 90 day Motion for an Extension of Time.)** Plaintiffs also seeks a statement of the basis for this Courts ruling denying Plaintiff a 90 day extension of time and this Courts ruling on Plaintiff's Motion for Reconsideration mentioned herein.

As the basis for this motion, the Plaintiffs submits herewith Plaintiffs Memorandum in Support of Plaintiffs Objection and Motion for Reconsideration of this Courts Order entered on March 16, 2007 regarding (Docket #28), **Judge Mary Lisi** denying Plaintiff's 90 day Motion for an Extension of Time.

Respectfully submitted on this 23rd day of March 2007.

Lori Zarlenga Blaquiere
Pro Se

101 Border Street
West Warwick,R.I.02893
Phone: (401) 821-3960

CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day March 2007, I served a copy of the within Plaintiff's Objection and Motion for Reconsideration of this Courts Order Entered on March 16, 2007 regarding (Docket # 28), Judge Mary Lisi denying Plaintiff's 90 day Motion for an Extension of Time to, Marc DeSisto, Desisto Law , 211 Angell St. P.O. Box 2563, Providence, R.I. 02906-2563, Rebecca Tedford Partington, Attorney General's Office, 150 South Main Street, Providence, R.I. 02903 by overnight Express mail, postage prepaid.

Lori Zarlenga Blaquiere

UNITED STATES DISTRICT COURT

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Defendants

MEMORANDUM IN SUPPORT OF PLAINTIFF'S OBJECTION AND MOTION FOR RECONSIDERATION OF THIS COURTS ORDER ENTERED ON MARCH 16, 2007 REGARDING(DOCKET # 28), JUDGE MARY LISI DENYING PLAINTIFF'S MOTION FOR A 90 DAY EXTENTSION OF TIME

1. Plaintiff requests that this Court Reconsider the Order entered on March 16, 2007 regarding (Docket #28), **Judge Mary Lisi** denying Plaintiff's 90 day Motion for an Extension of Time or in the alternative the Plaintiff requests that this Court grant Plaintiff a 60 day extension of time, **(See attached Order entered in this Court on March 16TH 2007 regarding (Docket # 28), Judge Mary Lisi denying Plaintiff's 90 day Motion for an Extension of Time.)**

2. Plaintiff states that it is not unreasonable to grant Plaintiff 90 day extension in view of the fact that the defendants are obstructing Plaintiff's ability to obtain counsel to enter an appearance in this case to handle any and all matters of this Court and in Plaintiff's case.

3. Plaintiff states that it is not unreasonable to grant Plaintiff 90 day extension in view of the fact that it is necessary for Plaintiff to obtain counsel to enter an appearance in Plaintiff's case to handle any and all matters in this Court and in Plaintiff's case. Also, in view of the fact of Ms. Zarlenga Blaquiere's physical condition, Eosinophilia Myalgia Syndrome.

4. Plaintiff states that in view of the fact that Ms. Zarlenga Blaquiere's is without counsel and Plaintiff's physical condition, Eosinophilia Myalgia Syndrome, Plaintiff cannot fully respond to matters of this Court. Therefore, Plaintiff request that this Court grant Plaintiff a 90 day extension of time to fully respond and object to the defendants Johnson and Kelley's Motion to Dismiss in Lieu of Answer and Defendants Johnson and Kelley's Rule 11 Motion and Defendants Memorandums in support of Motions mentioned herein, **(See previously submitted Dr. Terry Heiman-Patterson medical report attached to Plaintiff's Motion for Extension of Time).**

5. Plaintiff states that Plaintiff is not an attorney and Plaintiff is without counsel. Plaintiff does not have any advanced academic degree, Plaintiff is not experienced with the law or legal procedures, and to ensure that a miscarriage of justice does not continue to occur in Plaintiff's case.

6.Plaintiff requests that this Court grant Plaintiffs a 90 day extension of time with regard to fully responding and objecting to the Defendants Johnson and Kelley's Motion to Dismiss in Lieu of Answer and Defendants Johnson and Kelley's Rule 11 Motion and Defendants Memorandums in support of Motions mentioned herein filed in this Court, to begin 90 days from the time of this Courts ruling on Plaintiffs Objection and Motion for Reconsideration of this Courts Order Entered on March16, 2007.

7.Plaintiff states that Plaintiff is in the process of serving the defendants in this case and that it is overly burdensome to respond to matters of this Court and for reasons mentioned herein. Therefore, Plaintiff requests that this Court grant a 90 day extension of time to respond to the defendants motions mentioned herein

8.Plaintiff states that Plaintiff presented summons to the clerk of this Court for signature and seal. Plaintiff states that the clerk signed the summons. However, the clerk of this Court deliberately did not place the seal on the summons for service on each defendant.

9.Plaintiff states that this Court deliberately delayed Plaintiff from serving the defendants in this case in a scheming manner to obstruct and cause harm to Plaintiff's case.

10.Plaintiff states that the clerk of this court filed the summons mentioned herein on January 29, 2007 and mailed the summons to Plaintiff without the seal of this court.

11.Plaintiff states that it is standard procedure for a clerk to sign, seal, and issue a summons for service on the defendants, (Rule 4.(a) and 4 (b) of the Federal Rule of Civil Procedure).

12.Plaintiff states that Plaintiff has in her possession the original summons with the signature of the clerk that contains no seal from this Court.

13. Plaintiff states that this Court (not on this Courts own initiative) reissued summons (Docket #2) on February 1, 2007 with the signature and seal of this Court.

14.Plaintiff states that Plaintiff was informed by clerk of this Court that it is standard procedure for this Court to place the seal of this court on summons for each defendant and that it is unusual and rare for this court to have omitted the seal on a summons presented to this Court. Plaintiff states that the defendants in this case were served with summons on February 15, 2007 and February 21, 2007.

15.Plaintiff states that the defendants are required pursuant to Federal Rules of Civil Procedure to answer Plaintiff's complaint within 20 days of being served.

16.Plaintiff states that the defendants filed a motion for extension of time on February 26, 2007 requesting that this court grant an extension of time up to and including March 23, 2007 to respond to Plaintiff's complaint giving defendants more than 30 days to respond to Plaintiff's complaint from the time the defendants were served .

17. Plaintiff states that this Court has not denied the defendants motion for extension of time filed on February 26, 2007 requesting that this court grant an extension of time up to and including March 23, 2007 to respond to Plaintiff's complaint.

18.Plaintiff states that Plaintiff is unprepared and without an attorney to represent Plaintiff and that Plaintiff will suffer serious irreparably harm and prejudice to Plaintiff and Plaintiff's case if this Court does not grant Plaintiffs a 90 day extension of time.

19.Plaintiff states that the Defendants will not suffer any prejudice as a result of granting Plaintiff's 90 day extension of time, other than this Court and the defendants prejudicing Plaintiff and Plaintiff's case.

20.Plaintiff states that judges, lawyers, governors, senators, law enforcement, public officials, are not above the law and have had a history of corruption and abuse of power, **(See "Reversal of Fortune" by author Attorney Alan Dershowitz)**

21.Plaintiff sates that this Court is hypocritical of its actions by claiming to uphold justice while at the same time committing injustice.

22.Plaintiff states that the defendants cowardly criminal actions have wasted tax payers dollars to surveillance Plaintiff and invade Plaintiff's right to privacy and conspire to murder Plaintiff.

23.Plaintiff states that Plaintiff's life being in danger and being targeted by law enforcement in connection with Showa Denko K.K. has intensified, since Plaintiff filed Plaintiff's December 7, 2006 complaint against the Defendants in the above-entitled matter. As a result, it has crippled Plaintiffs ability to respond to matters of this Court.

24.Plaintiff states that Plaintiff's mother Victoria Zarlenga is a witness to law enforcements criminal actions.

25.Plaintiff states that Jennell Hamlin the mother of Plaintiff's Grandchild is an informant for the Defendants and has plotted and planned under the direction of the Defendants to remove Plaintiff's Grandchild from Plaintiff's grandchild's home of 101 Border Street West Warwick R.I. in a deliberate attempt to murder Plaintiff at 101 Border Street West Warwick, R.I.

26.Plaintiff states that over 80% of intelligence gathering is from those closest to individuals being surveillanced, such as family, friends, among others.

27.Plaintiff states that Plaintiff has been deprived of her constitutional rights and due process and a fair decision maker in this Court among others.

28. Plaintiffs states that this court including court personnel has singled Plaintiff out in a deliberate attempt to obstruct and sabotage plaintiffs case inorder to protect the defendants and defense counsel in this case.

29.Plaintiff states that Defendants have invaded and damaged two of Plaintiffs personal home *computers* . Defendants are *presently* continuing to hack Plaintiffs personal home computer, **(See exhibit attached to Plaintiff's complaint filed in this Court on December 7, 2006 re: hacking of Plaintiff's computer)**

30. Plaintiff states that the defendants are responsible for wiretapping Plaintiffs home phones. As a result, the defendants have crippled Plaintiffs opportunity to defend herself and has prejudiced and delayed Plaintiffs filings and case and has unlawfully invaded Plaintiffs privacy.

31. Plaintiff states that the United States District of Rhode Island have deprived Plaintiff of her constitutional right to a fair, equal, and lawful judicial process and due process rights..

32.Plaintiff states that Plaintiff requires the above time to review the voluminous records, documents, and files and research that are crucial, relevant, and material with regard to fully responding to the defendants, and for reasons mentioned herein.

33.Plaintiff points out that as the administrative requirements of filing documents with with this Court are significant , and as Plaintiffs do not have ready access to office equipment, especially in light of Ms. Blaquiere's illness and for reasons mentioned herein. Plaintiffs need the 90 day extension requested .

34. Plaintiff states that the Defendants will not suffer prejudice, as a result of granting Plaintiff's 90 day extension of Time, other than prejudicing Plaintiff's ability to fully respond to the defendants motions mentioned herein.

35. Plaintiffs request that this court expedite the filing and ruling of Plaintiffs Objection and Motion for Reconsideration of this Courts Order entered on March 16, 2007 regarding (Docket #28), **Judge Mary Lisi** denying Plaintiff's 90 day Motion for an Extension of Time.

36. Plaintiff seeks leniency from this court. Plaintiff is at a disadvantage, since Plaintiff is not an attorneys and for reasons mentioned herein.

37.Plaintiff request from this court leniency based on Plaintiff's Pro Se status and to ensure a miscarriage of justice does not continue to occur in Plaintiff's case . Pro Se litigants must be ensured meaningful access to the courts, Bounds v. Smith 430 U.S. 817, 823, (1977).Pro Se pleadings are held to less stringent standards than those prepared by attorney, Haines v. Kerner 404 U.S. 519, 520-521 (1972). In Walter Process Equipment v. Food Machinery , 382 U.S. 172 (1965) it was held in a " motion to dismiss, the material allegations of the complaint are taken as admitted and true.

38. Where a Plaintiff pleads Pro Se in a suit for protection of civil rights, the court should endeavor to construe Plaintiffs pleading without regard to technicalities, Picking v. Pennsylvania Railway (151 F2d. 240) Third Cir. Court of Appeals.

39. In Puckett v. Cox, it was held that Pro Se complaint requires a less stringent reading than one drafted by a lawyer, (456 F2d 233 (1972 Sixth Circuit USCA) said Justice Black in Conley v. Gibson, 355 U.S. 41 AT 48 (1957) "The Federal Rules rejects the approach that pleading is a game of skill in which one misstep by counsel may be decisive to the outcome and accept the principle that the purpose of pleading is to facilitate a proper decision on the merits." According to Rule 8 (f) FRCP all pleadings shall be construed to do substantial justice".

40. Plaintiff states that if this court does not grant Plaintiffs a 90 day extension of time, this court allows then also to stand violations of the First, Fifth, Ninth, and Fourteenth amendments of the U.S. Constitution which would certainly not be in the general interest or good.

First Amendment in pertinent part provides:

> The First Amendment guarantees the freedom of worship, of speech, of the press, of assembly, and of petition to the government for redress of grievances.

Fifth Amendment in pertinent part provides:

> " No person shall ... ; ... ; ... , nor be deprived of life, liberty, or property, without due process of law; ...."

Ninth Amendment in pertinent part provides:

> " The enumeration in the Constitution, of certain rights, shall not be construed to deny or disparage others retained by the people."

Fourteenth Amendment in pertinent part provides:

> no State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any state deprive any person of life, liberty or property, with out due process of law; nor deny to any person within its jurisdiction the equal protection of the laws.

41. Plaintiffs also seeks a statement of the basis for this Courts ruling denying Plaintiff a 90 day extension of time and this Courts ruling on Plaintiff's Motion for Reconsideration mentioned herein.

For all the foregoing reasons, Plaintiff requests that this Court grant Plaintiff's Motion to Reconsider this Courts Order entered on March 16, 2007 regarding (Docket #28), **Judge Mary Lisi** denying Plaintiff's 90 day Motion for an Extension of Time or in the alternative the Plaintiff requests that this Court grant Plaintiff a 60 day extension of time.

Respectfully submitted on this 23rd day of March 2007.

Lori Zarlenga Blaquiere
Pro Se
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